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Attorneys for General Motors LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	: Chapter 11
	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	: Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:
	:
Debtors.	: (Jointly Administered)
-----X	

**NOTICE OF FILING OF TENTH SUPPLEMENT TO
SCHEDULE "2" TO THE MOTION OF GENERAL MOTORS LLC
PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE THE
COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION**

PLEASE TAKE NOTICE that on October 15, 2014, General Motors LLC filed the attached *Tenth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction* with the United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York
October 15, 2014

Respectfully submitted,

/s/ Scott I. Davidson

Arthur Steinberg

Scott Davidson

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TENTH SUPPLEMENT¹ TO SCHEDULE “2”

**SAMPLE ALLEGATIONS/CAUSES OF ACTION IN IGNITION SWITCH
COMPLAINTS FILED AGAINST NEW GM NOT CONTAINED IN THE
PREVIOUS SUPPLEMENTS TO SCHEDULE “2” TO MOTION TO ENFORCE²**

<u>Plaintiff</u>	<u>Allegations</u>
Mullins	<p>The Mullins Action concerns a 2010 Chevrolet HHR, allegedly purchased by the Plaintiff in August 2010 from Curtis Automotive. Compl., ¶ 4.</p> <p>“After the purchase of the motor vehicle as aforesaid, the Plaintiff experienced repeated nonconformities with the motor vehicle which substantially impaired the use and market value of the subject motor vehicle including but not limited to problems with the ignition, power steering, rack and pinion, and jerking of vehicle.” Compl., ¶ 7.</p> <p>“That Plaintiff’s vehicle has been subjected to multiple recalls relating to the electric power steering, ignition switch defects, defective lock cylinder and other defective conditions which resulted in multiple accidents involving the vehicle.” Compl., ¶ 28.</p> <p>“Defendant manufactured or sold Plaintiff a vehicle with defective parts such as the ignition switch which was very clearly a defect and was a defect that represents an unreasonable risk to safety. (Product Liability).” Compl., ¶ 29.</p> <p>“Defendant among other things made fraudulent misrepresentations and omission by assuring regulators that recalls were not necessary, hid changes to defective ignition switch, sent out misleading service bulletins related to engine failure, power steering, ignition switch dangers and as such fraudulently concealed with the intention to mislead. (Fraud, Fraudulent misrepresentation and Fraudulent concealment).” Compl., ¶ 32.</p> <p>As set forth above and in the complaint filed in the Mullins Action, this Action concerns a vehicle that may have been repaired with a defective ignition switch manufactured by General Motors Corporation (n/k/a Motors Liquidation Company) (“Old GM”), and not New GM. As set forth in the Ignition Switch Motion to Enforce, New GM asserts that it is not liable for any claims based on parts manufactured by Old GM. Accordingly, the Mullins Action is subject to the Ignition Switch Motion to Enforce.</p>

¹ This schedule supplements the previous supplements and the original Schedule “2” previously filed with the Court in connection with the *Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction* on April 21, 2014 [Dkt. No. 12620] (“**Ignition Switch Motion to Enforce**”). See Dkt. Nos. 12620-2, 12672-8, 12699, 12720, 12723, 12781, 12819, 12844, 12907, 12939.

² Due to space limitations, this chart contains only a *sample* of statements, allegations and/or causes of action contained in the complaint referenced herein. This chart does *not* contain *all* statements, allegations and/or causes of action that New GM believes violates the provisions of the Court’s Sale Order and Injunction and the MSPA.